



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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February 9, 2024

VIA ECF

Honorable James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)

Your Honor:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendants City of New York and Jess Dannhauser in his official capacity as Commissioner of the New York City Administration of Children's Services ("ACS") (collectively, the "City Defendants") in the above-referenced matter. The Complaint alleges that from January 2021 until August 2023, based on false reports of child neglect and abuse, ACS unlawfully conducted several investigations of Plaintiff. I write to respectfully request a 7-day extension of the defendants' time to respond to the Complaint. This is the third request to extend the defendants' time to respond to the Complaint and Plaintiffs consent to this request.

I have completed representation interviews with each of the individual defendants in connection with this office's assessment of whether it will represent the individual defendants.¹ I am currently working to complete our internal conflicts checks by early next week in the hopes of representing all the defendants in this action.

In addition, one of the individual defendants experienced some limitations on her availability to discuss this matter following the loss of her mother at the end of January and I would appreciate the additional time to speak with her regarding this case.

¹ In addition to the City Defendants, the Complaint names as individual defendants Ariel Semper; Nadine Cenord; Bernadet Jean-Louis; Donna McFadden; Ana Costa; Taiesha Coleman; and Leydi Taveras.

Accordingly, I respectfully request the extension of the defendants' time to respond to the Complaint from February 12, 2024, to February 19, 2024.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Daniel R. Perez

Daniel R. Perez
Assistant Corporation Counsel